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August 13, 2018

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VIA ECF

The Honorable Katherine B. Forrest
United States District Judge
Southern District of New York
500 Pearl Street, Room 2230
New York, NY 10007

Re: Brennan Center for Justice v. U.S. Department of Justice, 17-cv-6335

Dear Judge Forrest:

We represent Plaintiffs Brennan Center for Justice and The Protect Democracy Project in the above-referenced action. We write on behalf of all parties in response to the Court's February 13, 2018 Order (Dkt. No. 45) directing the parties to file a joint letter regarding the status of this litigation, and the Court's June 25, 2018 Order (Dkt. No. 61) extending the parties' deadline to submit a briefing schedule to August 15, 2018.

The parties continue to engage in good-faith negotiations to resolve disputes regarding the sufficiency of Defendants' productions, and to narrow the issues to be briefed in this case. The parties require additional time to reach resolutions with seven defendant agencies and/or agency components regarding certain outstanding disputes over their productions. The parties therefore respectfully request that the deadline to submit a proposed briefing schedule to the Court be extended to September 7, 2018.

Respectfully,

/s/ Carl N. Wedoff
Carl N. Wedoff

Cc: Assistant U.S. Attorney Casey Lee (via ECF)